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February 21, 2022

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

The annexed documents, previously submitted under seal, contain proposed redactions in conformance with the Court's Orders (Dkt. 596, 605).¹

The proposed redactions are intended to ensure the integrity of the fact-finding process to uncover the truth surrounding Juror 50's conduct during the *voir dire* process, to ensure juror anonymity and privacy, and to preserve specific factual information developed by the defense that has not been publicly reported and that the defense proposes to inquire about at any forthcoming hearing.

In an abundance of caution, we have proposed redactions to information and data about the responses of other jurors (selected and prospective) to the jury questionnaire because the questionnaires and sealed portions of the *voir dire* transcript are not part of the public record. The public disclosure of juror information, even if provided anonymously, risks compromising the integrity of the jury selection process and the willingness of potential jurors to disclose personal information.

Very truly yours,

/s/

BOBBI C. STERNHEIM

Attachments
cc: Counsel of Record

¹ The documents - Ghislaine Maxwell's Motion for a New Trial, the Government's Opposition, and Ms. Maxwell's Reply - will remain under seal pending the Court's decision regarding the proposed redactions.